

# Exhibit B

---

**From:** Puig, Yvonne K.  
**Sent:** Sunday, October 13, 2013 9:12 PM  
**To:** 'Ben Gastel'; 'skelly@nutter.com'  
**Cc:** Greer, Marcy; 'gerards@branstetterlaw.com'; 'Hollabaugh, Lela'; Hoffman, Eric  
**Subject:** RE: NECC Discovery package

Gerard and Ben: We received this email and Gerard's other letter of October 7, both of which invite conferences to discuss our outstanding issues. Marcy and I have both been out of town all week, but can be available Tuesday, October 15, after 3:00 p.m. to discuss. To prepare for that conference, I have the following items outstanding:

1. Master Complaints and Answers
2. Bellwether and scheduling issues relating to MDL Order No. 7
3. Discovery requests
4. Kelvas subpoena

We also appreciate your extension of an additional 40 days to move, plead, or otherwise respond to the recent complaints filed by members of the Plaintiffs' Steering Committee so that we can hopefully work out a scheduling order in the meantime to have master pleadings to streamline and facilitate this litigation, as Judge Saylor encouraged.

As to service, we are checking with the client and will reply to you shortly. It makes sense to serve Lela as she has been authorized to accept the other suits as you know.

Please let me know if Tuesday afternoon works for you, and I can circulate a call-in number. Thanks, Yvonne.